



## Township of East Brunswick

Department of Public Safety

**JOHN P. CROSS**

Director/Chief

November 19, 1996 **FCC MAIL ROOM**

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**RECEIVED**

Secretary, FCC  
1919 M. Street. NW  
Room 222  
Washington, DC 20554

Re: Advanced Television System  
and their impact upon the  
Existing Television Broadcast Service

MM Docket no. 87-268  
Sixth Further Notice 96-317

Dear Chairman Hundt:

**DOCKET FILE COPY ORIGINAL**

East Brunswick Township, NJ wishes to express its strong support for Federal Communications Commission action to reallocate the current UHF broadcast television channels 60-69, and make a portion of that spectrum available for public safety use. The first step in the process is reallocation of UHF channels 60-69 as proposed by your staff in the above referenced digital television proceeding.

There is currently an urgent need in many parts of the country for additional public safety radio channels. The Public Safety Wireless Advisory Committee (PSWAC), co-sponsored by the FCC and the NTIA, recently released its "Final Report" which found that public safety agencies need at least 2.5 MHZ of additional spectrum right now for interoperability, at least 25 MHZ within five years, and an additional 70 MHZ within the next fifteen years.

East Brunswick Township, NJ agrees with the PSWAC findings. In our area, there are no radio channels available for expansion of existing systems or for implementation of new ones. Only immediate FCC action in making available new spectrum can help alleviate the problems faced by East Brunswick Township, NJ and many other public safety agencies around the nation.

The spectrum within channels 60-69 is ideal for public safety use. This block of UHF channels is adjacent to the 800 MHZ mobile radio frequencies heavily used by public safety agencies.

While we support the allocation of additional 800 MHz spectrum for public safety, we also alert the Commission to problems with the current DTV channel planning as it affects land mobile users of the 500 MHz shared TV channels 19 and 20 in the New Jersey

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and Eastern Pennsylvania area.

East Brunswick Township, NJ is currently licensed to operate public safety radio communications on frequencies derived from the sharing of the TV channels under 47 CFR, Part 90, Subpart L, Authorization In The Band 470-512 MHz (UHF-TV Sharing) of the FCC Rules. Six radio channels provide the delivery of life saving and property protection services of 6 police, fire and emergency medical agencies to a population of approximately 45,000 citizens and workers located in a 24 square mile area of New Jersey.

This 24-hour-per-day, public-safety radio system, is being installed at a cost of \$3,100,000.00 of taxpayers' money, and is essential to preserving the health and welfare of the general public. The Commission's proposal to allow a TV broadcast station to operate on adjacent channel 18 frequencies in Secaucus, New Jersey would create harmful interference to the public safety agencies, thus jeopardizing their ability to deliver the life safety and property protection services to which they are bound by law or charter.

We call to the attention of the Commission that the docket identifies separation of the proposed TV station from the center of the urbanized area, in this instance Philadelphia, PA, as less than the technically appropriate 110 miles between the broadcast operation site and the nearest adjacent channel land mobile site. However, we respectfully remind you that the allocation for use of the public safety communications channels derived from TV channel 19 (20) extends outward in a 50 mile radius of the center of the urbanized area. Further, the Commission has granted waivers of this "50 mile rule" in support of public safety operations, further expanding the radius to as much as 60 miles. **Thus the distance from the currently licensed operations and the proposed adjacent DTV channel is not the desired 110 miles, but considerably less as evidenced below.**

Our radio system, which operates on channels in the TV Channel 19 spectrum, will be impacted by interference from the proposed implementation of TV Channel 18 in Secaucus, New Jersey. The geographical coordinates of this proposed DTV transmitter is 40-42-43N, 74-00-49W. Our currently licensed East Brunswick, New Jersey transmitter site is located at the geographical coordinates 40-25-02N, 74-25-07W. This is a separation of only 29.43 miles. It is our position that such close spacing of interfering transmitters will jeopardize the delivery of services for the protection of life and property of the general public.

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We also urge the Commission not to eliminate use of Channel 20 for land mobile service in the Philadelphia region. With over 600 licensees now in operation, forcing them to seek other spectrum without financial support would be an inappropriate burden, particularly to the public-safety operations installed and support with public funds. In addition, relocation of affected services within an already congested spectrum region cannot be accomplished without further reducing frequency assignment options for present and future licensees.

East Brunswick Township, NJ urges the Commission to act expeditiously and favorably in this matter.

Sincerely,

A handwritten signature in cursive script, reading "Fred Laurie".

Captain Fred Laurie  
Administrative Officer